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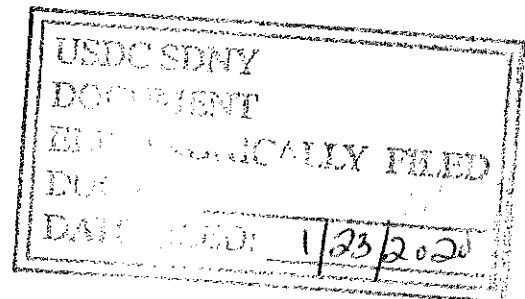
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January 17, 2020

MEMO ENDORSED

Hon. Denise L. Cote  
U.S. District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007-1312

Re: U.S. v. Michael Campana  
Dkt No. 1:19-cr-00859-DLC-1



Your Honor:

As the Court is aware, our law firm represents Defendant Michael Campana in the above-referenced matter. On November 26, 2019, Mr. Campana pled guilty to a one-count Information, charging him with Tax Evasion, pursuant to 26 U.S.C. §7201, and his sentencing is scheduled for March 20, 2020.

Mr. Campana lives in Tuckahoe, New York and his current bail conditions restrict his travel to SDNY, EDNY, NDNY, and New Jersey. We respectfully request that the Court expand those restrictions to allow him to travel to and from the District of Connecticut. Mr. Campana's father is the owner of a small masonry company, called Campana Masonry, that currently has a project ongoing in Greenwich, CT. His father is undergoing knee surgery today, however, and will not be able to work for several months. He has asked Michael to assist with the project in Greenwich while he is recovering from surgery. Michael would like to provide this assistance, which would require him to travel back and forth to Connecticut.

We have communicated with the AUSA David Lewis and Pretrial Officer Vincent Adams regarding this request and they both consent to it. Accordingly, we respectfully ask the Court to modify Mr. Campana's bail conditions to permit travel to and from Connecticut.

Thank you for your consideration.

*Gruntel*  
*Denise Cote*  
*1/23/20*

Respectfully submitted,

*David Smith*  
David Smith

cc: AUSA David Lewis